

DOWNEY BRAND LLP
ANTHONY L. VIGNOLO (Bar No. 203933)
JENNIFER L. WILLIAMS (Bar No. 261037)
KARINA R. STANHOPE (Bar No. 307147)
621 Capitol Mall, 18th Floor
Sacramento, CA 95814-4731
Telephone: 916.444.1000
Facsimile: 916.444.2100
avignolo@downeybrand.com
jwilliams@downeybrand.com
kstanhope@downeybrand.com

Attorneys for Plaintiff
STILLPATH RETREAT CENTER LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STILLPATH RETREAT CENTER LLC,
Plaintiff,
and
AMERICAN ADDICTION CENTERS,
INC.,
Plaintiff-Intervenor,
v.
COUNTY OF SAN MATEO,
Defendant.

Case No. 3:15-cv-01386-MMC

INDEX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Date: February 17, 2017
Time: 9:00 a.m.
Dept.: 7
Judge: Honorable Maxine Chesney

Trial: April 10, 2017
Filed: March 25, 2015

Exhibit	Date	Description
1.	02-19-2016	Excerpts of Deposition Transcript of Carole Groom
2.	01-21-2016	Excerpts of Deposition Transcript of Warren Slocum
3.	08-22-2013	Email from Warren Slocum to J.R. Rodine Re: Reconfirm Tuesday 8/27 @ 6:30 (Deposition Exhibit 77)
4.	02-09-2016	Excerpts of Deposition Transcript of Gail Slocum

1	5.	01-19-2016	Excerpts of Deposition Transcript of Mike Schaller, Volume I
2	6.	04-25-2006	Letter from J.R. Rodine to Planning Commission Re: Executive Summary of Application (Deposition Exhibit 30)
3	7.	10-23-2013	Memo to Planning Commission from Planning and Building Department Re: Consideration of Use Permit Amendment (Deposition Exhibit 45)
4	8.	04-24-2013	Email from Ray Blatt to Mike Schaller Re: Stillheart Zoning Use Letter (Deposition Exhibit 12)
5	9.	02-02-2007	Letter from Planning Commission Attaching Approval of 2007 Use Permit Amendment (Deposition Exhibit 36)
6	10.	n/a	Overview and History of Stillheart Institute (Deposition Exhibit 159)
7	11.	12-05-2016	Excerpts of Deposition Transcript of Debbie Gisonni
8	12.	10-13-2011	Letter to J.R. Rodine from Planning & Building Department Re: Letter of Decision (Deposition Exhibit 37)
9	13.	10-23-2013	Transcript from Planning Commission Meeting (Deposition Exhibit 42)
10	14.	01-20-2016	Excerpts of Deposition Transcript of Dave Pine
11	15.	01-11-2016	Excerpts of Deposition Transcript of Christopher Ranken
12	16.	03-24-2016	Letter from Christian Marsh to Board of Supervisors Re: Use Permit Amendment, Stillpath Recover Center, PLN 2006-00181 (Deposition Exhibit 83)
13	17.	03-17-2014	Interdepartmental Memo. to Board of Supervisors from Jim Eggemeyer Re: Public Hearing to Consider Appeals of the Planning Commission's Approval of the Amendment
14	18.	12-05-2013	Email from Laurie Simonson to Dave Pine Re: Proposal for Drug Rehab Facility (Deposition Exhibit 48)
15	19.	10-17-2013	Memo to J.R. Rodine and Ray Blatt from Mike Schaller Re: Letter from the Major of the City of Sausalito (Deposition Exhibit 41)
16	20.	07-29-2013	Stillpath's Application for Use Permit Amendment (Deposition Exhibit 216)
17	21.	02-26-2016	Excerpts of Deposition Transcript of Don Horsley
18	22.	11-04-2013	Email to J.R. Rodine from Horsley Re: Skyline (Deposition Exhibit 142)

1	23.	04-20-2016	Excerpts of Deposition Transcript of J.R. Rodine
2	24.	12-12-2013	Email from Don Horsley to Dave Pine Re: Proposal for Drug Rehab Facility on Skyline Blvd. Scenic Corridor (Deposition Exhibit 3)
3	25.	12-16-2013	Email to Don Horsley from Leiv Lea Re: New Drug Rehab Center (Deposition Exhibit 113)
4	26.	12-23-2013	Email from Ken Fisher to Don Horsley Re: Stillpath Recovery Center – Use Permit Amendment (PLN 2006-00181) (Deposition Exhibit 4)
5	27.	01-30-2014	Email from Dave Pine to Don Horsley Re: California's Crowded Prisons (Deposition Exhibit 60)
6	28.	02-11-2016	Excerpts of Deposition Transcript of Adrienne Tissier
7	29.	Various	Invoices from J.R. Rodine to Ray and Michael Blatt for Consulting Services
8	30.	02-21-2014	Email to Maltbie from Horsley Re: Stillpath (Deposition Exhibit 105)
9	31.	03-12-2014	Email from Bob Floyd to Adrienne Tissier Re: Legal Assignment (Deposition Exhibit 61)
10	32.	02-06-2014	Email to Ellen Wise from Horsley Re: Stillpath Letter of Decision: Attachment A – No Condition to Exclude Court Mandated Clients (Deposition Exhibit 111)
11	33.	01-27-2014	Email to Rich Shapero from Horsley Re: Stillpath (Deposition Exhibit 112)
12	34.	03-24-2014	Email from Dave Pine to David Burruto Re: Hearing on Stillpath Change of Use Tuesday March 25th (Deposition Exhibit 70)
13	35.	03-24-2014	Email to Lisa Sonsini from Don Horsley Re: Hearing on Stillpath Change of Use Tuesday March 5th (Deposition Exhibit 117)
14	36.	03-27-2014	Email to kon-tiki@netscape.com from Don Horsley Re: Stillpath (Deposition Exhibit 118)
15	37.	03-25-2014	Transcript from Board of Supervisors' Regular Meeting (Deposition Exhibit 74)
16	38.	03-27-2014	Letter from Heather Hardy to Ray Blatt Re: Final Letter of Decision (Deposition Exhibit 84)
17	39.	01-21-2014	Email from Dawn Smithson to Mike Schaller Re: Still Heart/Still Path (Deposition Exhibit 80)

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1	40.	12-11-2013	Email from Dawn Smithson to Mike Schaller Re: Still Heart/Still Path (Deposition Exhibit 81)
2	41.	03-23-2016	Excerpts of Deposition Transcript of Mike Schaller, Volume II
3	42.	03-22-2016	Excerpts of Deposition Transcript of Jim Eggemeyer
4	43.	05-04-2016	County's Responses to Stillpath's Requests for Admission, Set Two
5	44.	Various	Compilation of Relevant Discriminatory Correspondence to County (Deposition Exhibit 91)
6	45.	12-11-2013	Supplemental Staff Report, including attachments, from County Planning Staff to Planning Commission for December 11, 2013, Hearing
7	46.	01-22-2014	Supplemental Staff Report, including attachments, from County Planning Staff to Planning Commission for January 22, 2014, Hearing
8	47.	01-27-2014	Letter to Ray Blatt from County of San Mateo Planning & Building Department Re: Letter of Decision
9	48.	01-30-2014	Community of Interested Neighbors Application for Appeal, including attachments
10	49.	01-31-2014	Skyline Neighborhood Coalition Application for Appeal, including attachments
11	50.	Various	Compilation of Form-Like Correspondence to County in Opposition to Amendment
12	51.	Various	Compilation of Correspondence to County in Support of Amendment
13	52.	11-21-2013	Email to Don Horsley from J.R. Rodine Re: Ken Fisher
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21	DATED:	January 13, 2017	DOWNEY BRAND LLP
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23	By:	<u>/s/ Anthony L. Vignolo</u>	
24		ANTHONY L. VIGNOLO	
25		Attorneys for Plaintiff	
26		STILLPATH RETREAT CENTER LLC	
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